

Behrooz P. Vida, SBOT No. 20578040
Carla Reed Vida, SBOT No. 16674445
THE VIDA LAW FIRM, PLLC
3000 Central Drive
Bedford, Texas 76021
Tel: (817) 358-9977
Fax: (817) 358-9988
ATTORNEYS FOR DEBTOR(S)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE: §
STEPHEN DOUGLAS DURHAM aka § CASE NO. 15-42668-RFN-13
STEPHEN DURHAM DOUGLAS and §
JENNIFER LYNN DURHAM §
DEBTOR(S) § PRELIM: 11/24/15 @ 9:30 AM

DEBTORS' RESPONSE TO MOTION FOR RELIEF FROM
STAY AS FILED BY OCWEN LOAN SERVICING, LLC

TO THE HONORABLE JUDGE OF SAID COURT:

STEPHEN DOUGLAS DURHAM and JENNIFER LYNN DURHAM ("Debtors"), file this response to Motion For Relief From Automatic Stay (the "Motion"), filed by OCWEN LOAN SERVICING, LLC. ("Movant"), and would respectfully show the Court as follows:

1. Debtors admit paragraph 1 of Movant's Motion.
2. Debtors admit paragraph 2 of Movant's Motion except for Movant being the entity entitled to enforce the note which is neither admitted nor denied. With respect to the exhibit(s), the Court will give each exhibit its proper evidentiary value upon presentation.
3. Debtors admit paragraph 3 of Movant's Motion. With respect to the exhibit(s), the Court will give each exhibit its proper evidentiary value upon presentation.
4. Debtors can neither admit nor deny paragraph 4 of Movant's Motion. With respect to the exhibit(s), the Court will give each exhibit its proper evidentiary value upon presentation.

5. Debtors admits paragraph 5 of Movant's Motion.

6. Debtors can neither admit nor deny paragraph 6 of Movant's Motion.

7. Debtors can neither admit nor deny paragraph 7 of Movant's Motion.

8. Debtors deny paragraph 8 of Movant's Motion.

9. Debtors can neither admit nor deny the accuracy of the dollar amount alleged in paragraph 9 of Movant's Motion.

10. With respect to the exhibit(s), the Court will give each exhibit its proper evidentiary value upon presentation.

11. Debtors deny paragraph 11 of Movant's Motion. Debtors assert that Movant is or will be adequately protected as follows:

- i. pre-petition arrearage via chapter 13 plan payments;
- ii. post-petition payment by making them on a timely manner starting next month; and
- iii. post-petition defaults, if any, being addressed via inclusion in the Chapter 13 plan via a modification of the Chapter 13 plan.

Prayer

WHEREFORE, Debtors pray for an order of this Court denying all relief sought by Movant, and granting Debtor other and further relief as the Court deems just and proper.

Respectfully submitted:

By: /s/ Behrooz P. Vida 11/13/15
Behrooz P. Vida
State Bar No. 20578040
Carla Reed Vida
State Bar No. 16674445
THE VIDA LAW FIRM, PLLC
3000 Central Drive
Bedford, Texas 76021
EMAIL: filing@vidalawfirm
TEL: (817) 358-9977
FAX: (817) 358-9988

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and forgoing instrument was served on the date that the instrument was filed electronically. Service was accomplished electronically and/or by first class mail to the parties indicated below.

Chelsea Schneider, Esq.
MACKIE, WOLF & ZIENTZ, PC
14180 N. Dallas Pkwy #660
Dallas, Texas 75254

Via ECF

Tim Truman, Standing Chapter 13 Trustee

Via ECF

Stephen & Jennifer Durham
1910 Pin Oak Lane
Dallas, Texas 75253

VIA USMAIL

By: /s/ Behrooz P. Vida

Behrooz P. Vida
Carla R. Vida

11/10/15